

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Wireless Emergency Alerts	)	PS Docket 15-91
	)	
Amendments to Part 11 of the Commission's Rules	)	PS Docket 15-94
Regarding the Emergency Alert System	)	
	)	

**EXPRESSION OF INTEREST BY THE NEW YORK CITY EMERGENCY MANAGEMENT DEPARTMENT IN  
SUPPORTING FEDERAL COMMUNICATIONS COMMISSION TESTING OF THE ACCURACY OF THE  
WIRELESS EMERGENCY ALERTS SYSTEM'S GEOGRAPHIC TARGETING CAPABILITY**

*Filed Electronically July 10, 2019*

**Introduction**

The New York City Emergency Management Department ("NYCEM" or "the Department") has been actively engaged in the development, implementation, operation, and on-going efforts to improve the nation's emergency alerting systems.<sup>1</sup> NYCEM sincerely appreciates the Federal Communication Commission's ("FCC" or "the Commissions") recent rulemaking requiring commercial mobile service providers ("CMSPs") to increase the accuracy of geographic targeting of Wireless Emergency Alert ("WEA") messages<sup>2</sup> and the efforts of the CMSPs to implement the revised rules.<sup>3</sup> NYCEM considers WEA to be a mission-critical communication system and applauds the Commission for seeking participation of alert originators to test the accuracy of geo-targeting.<sup>4</sup> As the Commission is aware, NYCEM has conducted similar analyses of WEA delivery in the past<sup>5</sup> and would welcome the opportunity to support the Commission in this effort.

**Selection Criteria**

In its Public Notice, the Commission outlined the selection criteria it will use to select alert originators to participate in this testing effort. Details of how NYCEM meets this selection criteria follows:

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<sup>1</sup> See, for example, NYCEM comments filed in PS Dockets 15-91 and 15-94 on October 29, 2015, December 8, 2016, May, 29, 2018, June 27, 2018, September 10, 2018, October 9, 2018, and November 21, 2018.

<sup>2</sup> 47 CFR Part 10 § 10.450 Geo-targeting

<sup>3</sup> See, for example, CMSP responses to FCC Public Safety and Homeland Security ("PSHSB") Chief Lisa Fowlkes letters inquiring about readiness to comply with the November 2019 deadline for improved geographic targeting.

<sup>4</sup> See FCC Public Notice DA 19-551 released June 11, 2019.

<sup>5</sup> See NYCEM Ex Parte filings in PS Dockets 15-91 and 15-94 on November 21, 2019 and April 26, 2016.

1. *The alert originator's demonstrated ability to organize a large group of test participants that are customers of several participating CMS Providers that serve their jurisdiction and will accurately report their test results* – As previously noted, NYCEM has conducted analysis of WEA messages in the past using employees, trusted partners, and the general public using a convenience sample method. Additionally, during the development and testing efforts of NYCEM's Notify NYC mobile application, groups of 50 or more employees and/or volunteers were deployed strategically throughout New York City (and surrounding areas) with a standardized data collection tool to record whether or not a message was received during the various iterations of the test. In addition to employees, NYCEM manages the more than 1,500 Community Emergency Response Team ("CERT") volunteers throughout NYC and would be able to leverage this population to support data collection. Key elements to a successful test of this nature includes ensuring participants are fully briefed on:

- a. how the test will be conducted
- b. where they should be during the test
- c. what their phone settings should be programmed to and
- d. how to record test results

NYCEM has the requisite experience, technology (e.g., webinars, GIS mapping, data collection tools, etc.), and capacity to organize an exercise of this scale.

2. *The alert originator's demonstrated ability to organize a large group of test participants that can be positioned in geographically diverse locations throughout its jurisdiction* – As noted in (1) above, NYCEM's employees, network of trusted partners, and CERT volunteers reside and work throughout New York City's five boroughs (counties). As part of the test development plan, NYCEM can ensure geographic coverage throughout the five boroughs and produce maps of participant locations.
3. *The alert originator's demonstrated ability to conduct a public outreach campaign the ensures public awareness about a WEA test* – NYCEM maintains a robust External Affairs Division and routinely engages with local, regional, and national media through press releases, on-the-record interviews, and media advisories to provide information about emergency incidents and/or preparedness activities. NYCEM would leverage this same media network to alert the public about the planned test. Further, similar to messaging issued for national EAS and WEA tests, NYCEM would utilize Notify NYC, intergovernmental, and private sector distribution lists to widely disseminate information about the test.
4. *The alert originators' ability to send a State/Local WEA Test message* – NYCEM maintains a contract with Everbridge ([www.everbridge.com](http://www.everbridge.com)) for emergency mass notification services and would utilize this system to issue the State/Local WEA test messages.
5. *The alert originator's demonstrated expertise in data analysis* – For preparedness and emergency response purposes, NYCEM routinely collects, analyzes, and reports on various types and quantities of data. NYCEM has the internal capacity and expertise to collect, organize,

analyze and map the results of WEA geographic targeting testing. NYCEM has previously assembled and submitted reports to the Commission that underscore our Department's expertise in this area.

## **Conclusion**

As outlined above, NYCEM is willing, eager, and has the organizational expertise to support the Commission as it designs, implements, and analyzes the results of the planned geographic targeting testing. NYCEM appreciates the Commission's consideration of our expression of interest and would welcome the opportunity to answer and follow-up questions when and if needed.